



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2405

OCT 10 1990

Ref: 8HWM-FF

Mr. Robert M. Nelson, Jr., Manager
Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, Colorado 80402-0928

RE: Trench Excavation for Bldg. 891,
Phase 1-B Construction.

Dear Mr. Nelson:

Discussions were held between EPA and Mr. Koffer, EG&G's Project Manager for the 881 Hillside IM/IRA pertaining to the excavation of a utilities trench extending from the 881 Hillside treatment building toward Building 881. The construction area is outside of any identified Solid Waste Management Unit (SWMU).

Mr. Koffer is proposing to wet and subsequently scrape the top 6 inches of soil along the trench alignment prior to excavating the trench. This will allow removal of possibly plutonium-contaminated soil from the trench alignment. Preliminary data presented to EPA by Mr. Koffer during an October 4, 1990 site visit indicated low levels of plutonium in soil scrapes taken south of the treatment building site. During excavation, the soil will be moistened to meet the 15 percent soil moisture criteria as stated in the Phase IA and IB workplans. The top 6 inches of soil will be removed and placed in an area separate from the remaining soil to be excavated. The soil removed from the top 6 inches must be covered and stored in a manner to prevent transport by surface run-on and resuspension by wind. The soil will need to be stored until future disposition of the soil is determined.

EPA recommends that the soils below the top 6-inch scrape be sampled for radionuclides to verify that the soils are not contaminated. EPA believes that if the soils are not contaminated, the 15 percent soil moisture criteria will not have to be met during excavation and recompaction of the soils. It is important also to screen for volatile organic contamination as the trench is constructed. Any hazardous or mixed waste found would need to be handled substantively in accordance with the land disposal restrictions of RCRA.

ADMIN RECORD

A-DU01-000121

If you or members of your staff have any questions
pertaining to this matter, please contact Ms. Patricia Corbetta
at (303) 294-1135.

Sincerely,



Louis W. Johnson, Chief
Federal Facilities Remedial Branch

cc: Martin Hestmark, 8HWM-FF
Patricia Corbetta, 8HWM-FF
Gary Baughman, CDH
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Tom Olsen, DOE
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Jim Koffer, EG&G
Terry Smith, PRC

FCD:October 9, 1990:881const.ltr;PAC